

Tax Impact (4)

1. National tax authorities have not yet make any official announcement regarding the granting of extensions or suspension of time limits for compliance with tax obligations, and to date nine municipal authorities have pronounced themselves through decrees, granting extensions and suspending deadlines for compliance with municipal tax obligations.
2. The national executive by decree 4,186 dated April 12, 2020 extended for 30 days the term established in decree 4,160 dated March 13, 2020, by which the State of Alarm was declared throughout the National Territory. For more detailed information on this extension we invite you to review our Lega Letter.
3. By decree 006-2020 dated April 30, 2020, it was established an extension of the period for the Declaration and Payment of the Tax on Economic Activities, Industry, Commerce, Services or Similar of the Libertador Municipality of the Capital District for the fiscal period from 01/03/2020 to 31/03/2020, which may be paid until May 15, 2020. For more detailed information on this extension we invite you to review our Lega Letter.
4. The National Sports Fund through its Twitter account Collection published a statement informing that there is no extension for the payment of the contribution provided for in the Sports and Physical Activity Law. In said statement, contributors are urged to make payments through the bank account 0116-0118-9200-1530-4116 on behalf of the National Institute of Sport at the Banco Occidental de Discount, since the Fund's web platform is not operating.
5. However, SENIAT keeps its campaign exhorting taxpayers to comply with tax obligations by issuing communications through its social networks and even by sending individualized notifications and emails to special taxpayers. We consider that, in accordance with a correct interpretation supported within the framework of constitutional principles and the State's obligation to preserve the

fundamental right to health, within the framework of the State of Alarm decreed by the Executive, such notices, warrants and notifications will not take effect.

6. We insist that, even though there is no official pronouncement to date to agree to the postponement or suspension of deadlines for compliance with tax obligations, we consider that the measures adopted by the executive, regarding the declaration of the State of Alarm and quarantine, could prevent compliance with tax obligations for reasons of force majeure which, pursuant to the provisions of article 85 of the Organic Tax Code, constitute an exemption from liability for the commission of tax illicit acts. Additionally, article 5 of the Decree By means of which the State of Alarm is decreed to attend to the Sanitary Emergency of the Coronavirus (COVID-19) establishes the obligation of natural and legal persons to comply with its provisions and the direct responsibility of these for putting people's health at risk for not complying with its content, which reaffirms the existence of force

majeure reasons that impede the normal compliance with tax obligations.

At LEGA we are very attentive to any pronouncement of the tax authorities and / or the executive on this matter, which we consider necessary and urgent for reasons of legal certainty, and we will be constantly updating the information to keep our clients informed timely and truthfully.

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